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FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

## VIA ELECTRONIC FILING

Ms. Marlene Dortch Sccrelary Federal Communications Commission 236 Massachusetts Avenue, NE, Suite 110 Washington, D.C. 20002

Re: In the Matter of Review of Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers and Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket Nos. 01-338; 96-98; 98-147

Dear Ms. Dortch:

On January 17, 2003, David Bogaty of WorldNet Telecommunications, Inc. ("WorldNet") and the undersigned met individually with Jordan Coldstein, Legal Advisor to Commissioner Copps, and Jeffrey Carlisle, Richard Lerner, and Scott Bergmann of the Wireline Competition Bureau In the meeting, we discussed the Commission's examination of its UNE policies in light of the D.C. Circuit's *USTA* decision, and how the "impairment" analysis factors into the Cominission's decision making. Additionally, we discussed the importance of UNE-P to WorldNet's ability to provide competitive telecommunications services in Puerto Rico, and to WorldNet's current migration to become a facilities-based carrier. WorldNet also emphasized that competition is nearly non-existent in Puerto Rico, and because of the unique characteristics of the island of Puerto Rico, the Commission should consider retaining UNE-P in Puerto Rico as a means of promoling facilities-based competition.

One electronic copy of this notice is being submitted for each of the referenced proceedings in accordance with the Commission's rules.

Respectfully submitted,

Lawrence R Freedman

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Counsel for WorldNet Telecommunications, Inc

Cc: Jordan Goldstein Jeffrey Carlisle Scott Bergmann Richard Lerner

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